

**To:** Rasso, Mark[Rasso.Mark@epa.gov]  
**From:** Ash, Christine  
**Sent:** Wed 5/23/2018 8:37:26 PM  
**Subject:** Re: Exceeding lead AL while on 6 month monitoring

I'll follow up with NJDEP. Thanks! Good find and for looking into this more.

Christine Ash  
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On May 23, 2018, at 4:30 PM, Rasso, Mark <[Rasso.Mark@epa.gov](mailto:Rasso.Mark@epa.gov)> wrote:

Miguel, indicated that the Newark water system should continue to sample for lead every 6 months and that there is no reason to suspend such expectations. This is really a State call, but they should justify it.

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**From:** Deltoral, Miguel  
**Sent:** Thursday, May 03, 2018 10:50 AM  
**To:** Rasso, Mark <[Rasso.Mark@epa.gov](mailto:Rasso.Mark@epa.gov)>  
**Subject:** Re: Exceeding lead AL while on 6 month monitoring

I don't understand why they are not monitoring. The LCR requires them to keep sampling every six months until they qualify for reduced monitoring. The only exception would be if they were a (b)(3) system since 1992 and only now exceeded, which would mean they are required to put in treatment and would not have to monitor until they were done.

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Hi Mark,

Yes, as long as the system exceeds the lead or copper action level OR if they have an OWQP TT violation, they remain on 6-month monitoring. They have to stay on six-month monitoring until they qualify for reduced monitoring by meeting both the lead and copper ALs and OWQP values AND they get written State approval to reduce monitoring.

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**From:** Rasso, Mark  
**Sent:** Wednesday, May 2, 2018 3:25:28 PM  
**To:** Deltoral, Miguel  
**Subject:** Exceeding lead AL while on 6 month monitoring

Miguel

May I ask if a large systems is continuing to exceed the lead action level while on 6 month monitoring must they continue to take samples every 6 months indefinately? This involves a system which is just beginning lead service line replacement program and is currently reviewing its CCT. Thanks for any assistance you may provide.

Mark